

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PETER WILSON, individually and on	§	
behalf of all others similarly situated,	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	CIVIL ACTION NO. 4:24-CV-04003
	§	
TEXONA MARKETING, LLC d/b/a	§	
COLLINS GHOSTWRITING,	§	
<i>Defendant.</i>	§	

**DEFENDANT'S FIRST AMENDED RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES**

To: Plaintiff, Peter Wilson, through his attorneys of record.

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant TEXONA MARKETING, LLC, ("Defendant"), serves these first amended responses to the Plaintiff, PETER WILSON ("Defendant")'s interrogatories, within the time prescribed by the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Ali A. Hakeem

Ali A. Hakeem

Of Counsel

Sowell, Walls & Powell PLLC

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(832) 437-0973

Attorney for Defendant

FIRST AMENDED ANSWER:

Defendant objects to this request in that it is overly broad, not reasonably limited in time and scope and seeks information that is not reasonably expected to lead to admissible evidence.

Subject to and without waiving the foregoing, Defendant has communicated with Dial Pad and Ring Central, regarding the requests for production propounded by Plaintiff. Defendant will be supplementing copies of communications with Dial Pad and Ring Central in response to requests for production propounded by Plaintiff.

12. Identify by make, model, structure and location the system(s), platform(s), and/or equipment used by you, or any vendor, used to contact the Plaintiff.

FIRST AMENDED ANSWER:

Defendant used Dial Paid for communications with Plaintiff.

13. State all facts in support of any affirmative defenses you have raised.

ANSWER:

Defendant has not asserted affirmative defenses at this time.

14. Identify any person (whether employed by you or not) whom you have disciplined, reprimanded, or taken similar action against for allowing or making allegedly unlawful or unauthorized outbound calls. In your answer, please identify all persons involved in any investigation, describe the reasons for your disciplinary action or reprimand, and describe the action taken against the person.

ANSWER:

Defendant objects to this request in that it is overly broad, not reasonably limited in time and scope and seeks information that is not reasonably expected to lead to admissible evidence.

VERIFICATION

The statements made in DEFENDANT'S FIRST AMENDED RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES are true and correct. I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 4/25/2025.

A handwritten signature in blue ink, appearing to read "Andrew Hales", is positioned above a horizontal line.

ANDREW HALES